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2015-L-008360  
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CIRCUIT COURT OF  
COOK COUNTY, ILLINOIS  
LAW DIVISION  
CLERK DOROTHY BROWN

IN THE CIRCUIT COURT OF COOK COUNTY  
ILLINOIS – LAW DIVISION

Hanan Faraj,

Plaintiff,

v.

Dollar Tree Stores, Inc.,

Defendant.

Case No. 2015 L 008360

**JURY TRIAL DEMANDED**

**FIRST AMENDED COMPLAINT**

Plaintiff Hanan Faraj complains against defendant Dollar Tree Stores, Inc., a corporation, as follows:

1. Defendant owns and operates several retail stores throughout Illinois.
2. The stores operate under the name "Dollar Tree."
3. One of its stores is located at 5347 N Lincoln Ave, Chicago, IL 60625.
4. On or about September 29, 2014, Plaintiff was shopping in the Lincoln Ave. store.
5. While in the store, an undetected wet substance on the floor caused Plaintiff to slip and fall.
6. As Plaintiff fell to the floor, her left knee bent and twisted on an unnatural angle.



7. As her right foot slipped out from under her, and her left leg crumpled under her weight, she fell back and landed directly on her right shoulder. Her left arm was whipped back and slammed on the ground above her head. It was a terrible crash.
8. The fall was incredibly painful. She cried out in pain immediately.
9. Plaintiff laid on the floor crying for some time before the manager of the store came to her aid.
10. As she writhed in pain on the floor, Plaintiff noticed the slippery substance for the first time.
11. It smelled like vomit and appeared to have been on the floor for quite some time.
12. When the manager finally arrived, he asked Plaintiff if she could walk. She could not stand under her own strength, so the manager helped her take a seat on some boxes.
13. While the manager called the paramedics, Plaintiff took a photograph of the slippery substance with her cell-phone (See Exhibit 1).
14. The ambulance arrived and transported the plaintiff to the emergency room where she was treated for her injuries.
15. Her left leg, right shoulder, and left hand were injured in the fall (See Exhibit 2).
16. She suffered mental and emotional anguish from having a substance she believes was vomit smeared all over her body and clothes.

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17. The injuries were severe and persist to this day. Plaintiff still suffers pain and immobility as a result of the injury.

### **COUNT I - NEGLIGENCE**

18. Defendant owed plaintiff a duty of care to properly maintain the premises, and to warn the plaintiff of any hidden dangers.
19. Defendant breached its duty because it failed to promptly clean the slippery substance from the floor or warn the plaintiff of the danger of the slippery substance.
20. The defendant's negligence caused the plaintiff to slip and fall, which caused her leg to bend at an awkward angle and her shoulder to hit the floor.
21. Plaintiff suffered physical, mental, and emotional damages as a result of Defendant's negligence
22. The damage to plaintiff's leg and shoulder require continued medical treatment and caused permanent damages.

WHEREFORE plaintiff demands payment in excess of \$50,000.00 for damages suffered, costs, interest, and any other relief allowed by law.

**Plaintiff demands trial by jury for all facts at issue.**



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**Rule 222(b) Affidavit**

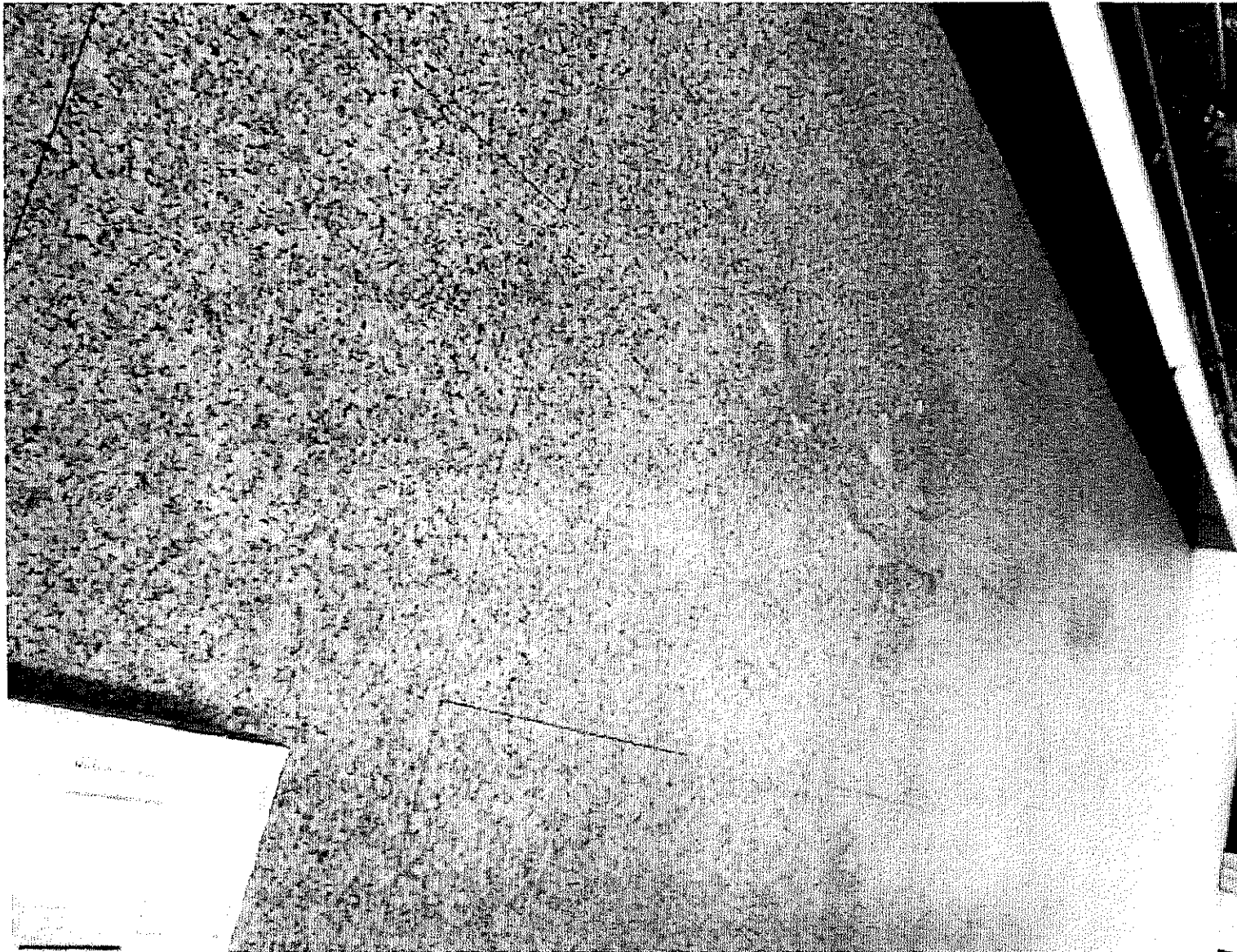
Pursuant to Supreme Court Rule 222(b) the plaintiff affirms that the attached complaint seeks damages in excess of \$50,000.00.

Hanan Faraj  
Hanan Faraj, Plaintiff

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